

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

SANTOS A. RANGEL, et al.	)	
	)	
Plaintiffs,	)	Case No.: 17 CV 50244
	)	
v.	)	Hon. Judge: Frederick J. Kapala
	)	Mag Judge: Iain D. Johnston
HEARTLAND HEALTHCARE FUND,	)	
Trustees of the Heartland Healthcare Fund,	)	
BRUCE WERNING, DAVID FOY, DAVID	)	
ARGUBRIGHT, STEVEN TONDI, GREG	)	
MULHERIN, and DANIEL F. AUSSEM,	)	
	)	
Defendants.	)	

**AMENDED COMPLAINT**

Plaintiffs, by their attorneys, Rathje & Woodward, LLC, complain of Defendants HEARTLAND HEALTHCARE FUND (“Fund”), BRUCE WERNING, DAVID FOY, DAVID ARGUBRIGHT, STEVEN TONDI, GREG MULHERIN and DANIEL F. AUSSEM (hereinafter collectively as “Trustees”), as follows:

**Nature of the Action**

1. Plaintiffs, as participants in the Fund as defined under the Employee Retirement Income Security Act (“ERISA”), 29 U.S.C. §1001 *et seq.*, and acting for themselves and on behalf of all other similarly situated, bring this action against Defendants to redress fiduciary violations in which Defendants participated as ERISA fiduciaries in violation of the Trust Agreement and ERISA.

**Jurisdiction, Standing and Venue**

2. This Court has jurisdiction pursuant to ERISA §§ 502(e)(1) and 502(f), 29 U.S.C. § 1132(e)(1) and 132(f).

3. Plaintiffs are empowered to bring this action as participants pursuant to ERISA §§ 502(a)(1)(B), 502(a)(2) and 502(a)(3), 29 U.S.C. §§ 1132(a)(1)(B), 1132(a)(2) and 1132(a)(3).

4. Venue is based on 28 U.S.C. § 1391(b)(2) and ERISA §502(e)(2), 29 U.S.C. §1132(e)(2).

### **Parties**

5. Plaintiff, Santos A. Rangel, is a resident of Whiteside County, and is a participant in the Heartland Healthcare Fund. Mr. Rangel is a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

6. Plaintiff, Anthony Romano, is a resident of Whiteside County, and is a participant in the Heartland Healthcare Fund. Mr. Romano is a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

7. Plaintiff, Byran Adams, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

8. Plaintiff, Toby Adcock, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

9. Plaintiff, Curtis Albus, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

10. Plaintiff, Andrew Alexander, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

11. Plaintiff, Ashley Ambeau, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

12. Plaintiff, Angela Baker, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

13. Plaintiff, Benjamin Beard, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

14. Plaintiff, Brent Bellows, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

15. Plaintiff, James K. Bennett, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

16. Plaintiff, Francis Berogan, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

17. Plaintiff, Alek Blackbourn, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

18. Plaintiff, Richard Blackburn, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

19. Plaintiff, Tom Bluhm, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

20. Plaintiff, Joshua Blythe, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

21. Plaintiff, Terry Boken, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

22. Plaintiff, David Bolen, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

23. Plaintiff, Albert Bollman, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

24. Plaintiff, Eric Boren, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

25. Plaintiff, Mat Bostelman, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

26. Plaintiff, Brian Bovey, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

27. Plaintiff, Sanford Bowman, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

28. Plaintiff, Erik Brehm, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

29. Plaintiff, Dylan Bridgewater, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

30. Plaintiff, Tyler Brown, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

31. Plaintiff, Roger Buchholz, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

32. Plaintiff, Mathew Burger, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

33. Plaintiff, Brian E. Burgess, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

34. Plaintiff, David Burgess, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

35. Plaintiff, Steven Buskohl, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

36. Plaintiff, Robert Cain, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

37. Plaintiff, Jorge Camacho, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

38. Plaintiff, Calvin Carver, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

39. Plaintiff, Richard Caudillo, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

40. Plaintiff, Steve Cecchetti, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

41. Plaintiff, Alfredo Cervantes, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

42. Plaintiff, Gary Cervený, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

43. Plaintiff, Terry Chambers, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

44. Plaintiff, Velinda Cheshier, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

45. Plaintiff, Douglas Christensen, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

46. Plaintiff, Michael Cibu, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

47. Plaintiff, Ruben Cisneros, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

48. Plaintiff, Matthew Clapper, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

49. Plaintiff, Andrew Clark, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

50. Plaintiff, Walter Coil, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

51. Plaintiff, Steve Commons, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.



52. Plaintiff, Daniel Conway, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

53. Plaintiff, Douglas Corning, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

54. Plaintiff, Mark Cox, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

55. Plaintiff, Joshua Coyle, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

56. Plaintiff, Hugh Cruse, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

57. Plaintiff, Shannon Cullen, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

58. Plaintiff, Richard Cutler, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

59. Plaintiff, James Dallas, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

60. Plaintiff, Charles Danekas, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

61. Plaintiff, Matthew Davies, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

62. Plaintiff, Shawn Day, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

63. Plaintiff, Paul Delgado, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

64. Plaintiff, Raymond Delgado, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

65. Plaintiff, William Dennis, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

66. Plaintiff, David Devine, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

67. Plaintiff, Israel Donna, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

68. Plaintiff, Joe Donna, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

69. Plaintiff, Nicholas Dowdy, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

70. Plaintiff, Nicholas Drucklieb, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

71. Plaintiff, Daniel Duffy, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

72. Plaintiff, Zachary Dunaway, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

73. Plaintiff, Jackie Duncan, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

74. Plaintiff, Jeff Duncan, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

75. Plaintiff, Linda Dunne, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

76. Plaintiff, Philip Dybas, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

77. Plaintiff, David Edge, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

78. Plaintiff, Brian Eisenberg, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

79. Plaintiff, Darryl Elgin, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

80. Plaintiff, Timothy D. Engelkes, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

81. Plaintiff, Kerry Enlow, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

82. Plaintiff, Chuck Feary, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

83. Plaintiff, Keith Fogle, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

84. Plaintiff, Doug Foster, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

85. Plaintiff, Scott Fox, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

86. Plaintiff, Fernando Gallegos, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

87. Plaintiff, Benito Garcia, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

88. Plaintiff, Brittany Garland, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

89. Plaintiff, Jeremy Genz, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

90. Plaintiff, Jerry Gibson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

91. Plaintiff, Dillon Giese, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

92. Plaintiff, Mike Glenn, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

93. Plaintiff, Alex Gomer, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

94. Plaintiff, Anna Gomer, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

95. Plaintiff, Alberto Gonzalez, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

96. Plaintiff, Luis Gonzalez, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

97. Plaintiff, Patrick Gourley, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

98. Plaintiff, Jamie Graff, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

99. Plaintiff, Jeremy Garmento, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

100. Plaintiff, Michael Gray, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

101. Plaintiff, Paul Grim, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

102. Plaintiff, Dale Grobe, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

103. Plaintiff, Daniel Grove, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

104. Plaintiff, Aspen Gunnon, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

105. Plaintiff, Jeffrey Halverson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

106. Plaintiff, David Hammes, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

107. Plaintiff, Matthew G. Hamilton, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.



108. Plaintiff, Richard Hamilton, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

109. Plaintiff, Mark Hassler, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

110. Plaintiff, Chris Hazelwood, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

111. Plaintiff, Mike Hecathorn, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

112. Plaintiff, David Heckman, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

113. Plaintiff, Glen Helfrich, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

114. Plaintiff, Don Henrickson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

115. Plaintiff, Andrew Hermes, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

116. Plaintiff, Jason Hernandez, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

117. Plaintiff, Thomas Hernandez, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

118. Plaintiff, George Hess, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

119. Plaintiff, Angela Hix Lawrence, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

120. Plaintiff, Shawn Hoffman, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

121. Plaintiff, Nick Holland, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

122. Plaintiff, Jason Hollinger, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

123. Plaintiff, Harold Hoskins, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

124. Plaintiff, William Howard, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

125. Plaintiff, Darren Howells, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

126. Plaintiff, Anthony Howe, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

127. Plaintiff, John Hoyle, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

128. Plaintiff, Matthew Hoyle, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

129. Plaintiff, Wesley Hughes, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

130. Plaintiff, William Hughes, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

131. Plaintiff, Connie Hunt, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

132. Plaintiff, Tommy Hunt, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

133. Plaintiff, Tyler Hunt, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

134. Plaintiff, Steven Ingenthorne, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

135. Plaintiff, Brandon Jackley, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

136. Plaintiff, Benjamin Jarvis, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

137. Plaintiff, Michael Jensen, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

138. Plaintiff, Justin Johnson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

139. Plaintiff, Dylan Jones, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

140. Plaintiff, Richard Jordan, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

141. Plaintiff, Mark Joynt, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

142. Plaintiff, Michael Joynt, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

143. Plaintiff, Richard Keefer, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

144. Plaintiff, Andrew Kane, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

145. Plaintiff, Russell Kelley, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

146. Plaintiff, Kevin Kelly, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

147. Plaintiff, Kevin Kemmerer, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

148. Plaintiff, Kenneth Kennedy, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

149. Plaintiff, Curtis Keplinger, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

150. Plaintiff, Benjamin Kibble, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

151. Plaintiff, Ronald Knox, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

152. Plaintiff, Craig Kobler, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

153. Plaintiff, Kenneth Kradle, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

154. Plaintiff, Demetrius Lahman, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

155. Plaintiff, Keith Langfield, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

156. Plaintiff, Kenneth Lauff, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

157. Plaintiff, Nick Lauff, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

158. Plaintiff, Levi Lauritzen, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

159. Plaintiff, Catherine Lawson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

160. Plaintiff, Markus Lawson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

161. Plaintiff, Lucas Lay, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

162. Plaintiff, Mark Lay, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

163. Plaintiff, Jeffrey Lee, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.



164. Plaintiff, James A. Leslie, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

165. Plaintiff, Ronald W. Levan, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

166. Plaintiff, Rick Lewis, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

167. Plaintiff, Bryant Lilly, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

168. Plaintiff, Rodney Lott, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

169. Plaintiff, Daniel Lohse, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

170. Plaintiff, Espen Long, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

171. Plaintiff, Robert Macklin, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

172. Plaintiff, Nick Madding, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

173. Plaintiff, William Manon, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

174. Plaintiff, Joyce Maronde, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

175. Plaintiff, John Martin, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

176. Plaintiff, Matt May, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

177. Plaintiff, Blaine McClellan, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

178. Plaintiff, Timothy McCullough, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

179. Plaintiff, Chris McElhinney, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

180. Plaintiff, Timothy McGinn, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

181. Plaintiff, Kyle McHugh, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

182. Plaintiff, Caleb McGuire, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

183. Plaintiff, Jeremy McGuire, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

184. Plaintiff, Eric Meacham, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

185. Plaintiff, Keith Medema, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

186. Plaintiff, Donna Mekemson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

187. Plaintiff, Tim Melsness, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

188. Plaintiff, Jeff Meusel, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

189. Plaintiff, Steven Miles, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

190. Plaintiff, Robert Miller, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

191. Plaintiff, Shane Miller, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

192. Plaintiff, Tanner Miller, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

193. Plaintiff, Tim Mills, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

194. Plaintiff, Michael Milne, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

195. Plaintiff, Kipton Minor, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

196. Plaintiff, Jeffrey Miskell, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

197. Plaintiff, Pat Moore, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

198. Plaintiff, Richard Morris, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

199. Plaintiff, Linda Moss, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

200. Plaintiff, Ron Newlon, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

201. Plaintiff, Michael Nicholson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

202. Plaintiff, Steve Nicholson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

203. Plaintiff, Timothy O'Brien, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

204. Plaintiff, Jeff Olson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

205. Plaintiff, Jerrick Orsted, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

206. Plaintiff, Stephen Osenberg, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

207. Plaintiff, Tim Pair, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

208. Plaintiff, Rosa Palmer, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

209. Plaintiff, Anthony Partridge, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

210. Plaintiff, Richard Patterson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

211. Plaintiff, Russell Patterson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

212. Plaintiff, Mike Payne, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

213. Plaintiff, Matt Personette, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

214. Plaintiff, Daniel Phillips, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

215. Plaintiff, Ryan Piper, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

216. Plaintiff, Anthony Pope, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

217. Plaintiff, Rick Porter, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

218. Plaintiff, Toni Pyse, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

219. Plaintiff, Caleb Ramirez, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.



220. Plaintiff, Rick Rasmussen, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

221. Plaintiff, Vicki Raymond, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

222. Plaintiff, Michael Reed, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

223. Plaintiff, Lowell Rhodes, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

224. Plaintiff, William Richard, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

225. Plaintiff, Vernon Richardson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

226. Plaintiff, Timothy Ries, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

227. Plaintiff, Deb Rios, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

228. Plaintiff, Adrian Roberts, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

229. Plaintiff, Richard Rodriquez, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

230. Plaintiff, Pedro Romo, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

231. Plaintiff, Jason Rudkin, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

232. Plaintiff, Nathaniel Ruth, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

233. Plaintiff, Diante Sanders, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

234. Plaintiff, Michael Sandoval, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

235. Plaintiff, Matt Sanford, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

236. Plaintiff, Marty Scanlan, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

237. Plaintiff, Robert Schaeffer, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

238. Plaintiff, Adam Schauff, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

239. Plaintiff, Hannah Schmidt, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

240. Plaintiff, Debbie Schmitt, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

241. Plaintiff, Christopher Schulte, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

242. Plaintiff, Jason Schwartz, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

243. Plaintiff, Dean Scott, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

244. Plaintiff, Lance Searcy, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

245. Plaintiff, Scott Seeley, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

246. Plaintiff, Rodney Senn, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

247. Plaintiff, Patricia Sexton, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

248. Plaintiff, Joshua Shaw, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

249. Plaintiff, Michael Shoemaker, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

250. Plaintiff, Holly Shover, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

251. Plaintiff, Jeffrey Sickles, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

252. Plaintiff, Randy Sitter, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

253. Plaintiff, Kevin Skibbe, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

254. Plaintiff, Michelle Sloat, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

255. Plaintiff, Bruce Smith, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

256. Plaintiff, Levi Smith, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

257. Plaintiff, Shawn Smith, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

258. Plaintiff, Gary Snapp, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

259. Plaintiff, Gregg Sneek, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

260. Plaintiff, Thomas Snitchler, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

261. Plaintiff, Nicholas Spangler, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

262. Plaintiff, Steven Spangler, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

263. Plaintiff, Terry Spencer, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

264. Plaintiff, David Spink, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

265. Plaintiff, Benjamin Spotts, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

266. Plaintiff, Greg Spratt, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

267. Plaintiff, Salena Sterling, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

268. Plaintiff, Chad Stoudt, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

269. Plaintiff, Derek Sunday, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

270. Plaintiff, Michael Sunday, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

271. Plaintiff, Larry Sword, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

272. Plaintiff, Michael Szabo, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

273. Plaintiff, Antonio Tablante, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

274. Plaintiff, Austin Taft, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

275. Plaintiff, Jack Tarbill, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.



276. Plaintiff, John Tate, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

277. Plaintiff, Ben Taylor, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

278. Plaintiff, Shane Thomas, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

279. Plaintiff, Ben Thrasher, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

280. Plaintiff, Jake Trader, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

281. Plaintiff, Anthony Turner, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

282. Plaintiff, Clarisa Tyler, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

283. Plaintiff, Timothy Valentine, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

284. Plaintiff, Cory Van Horn, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

285. Plaintiff, David Wagenknecht, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

286. Plaintiff, Michael Walls, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

287. Plaintiff, Douglas Weaver, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

288. Plaintiff, Bradley Webb, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

289. Plaintiff, Carol Weigle, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

290. Plaintiff, Thomas Weinzierl, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

291. Plaintiff, Michael Welch, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

292. Plaintiff, Joshua Wells, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

293. Plaintiff, Monroe Wells, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

294. Plaintiff, Michael Werner, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

295. Plaintiff, Kurt Wessels, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

296. Plaintiff, Dwayne Wetzell, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

297. Plaintiff, Brian Williams, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

298. Plaintiff, James Williams, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

299. Plaintiff, Mark Williams, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

300. Plaintiff, Tim Williams, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

301. Plaintiff, Brandon Williamson, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

302. Plaintiff, Victoria Withers, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

303. Plaintiff, Kenny Withrow, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

304. Plaintiff, Josh Worrell, is a participant in the Heartland Healthcare Fund, a member of Carpenters Local 790 based on Rock Falls, Whiteside County, IL, and is an Employee of Raynor Garage Doors in Dixon, Lee County, IL.

305. Defendant, Heartland Healthcare Fund (“Fund”), is a multi-employer welfare fund that receives contributions pursuant to collective bargaining agreements (“CBAs”) negotiated by the Chicago Regional Council of Carpenters f/n/a Heartland Regional Council of Carpenters (“Union”) with various individual employers and employer associations.

306. Defendant, Bruce Werning, is the Director of the Western Region of the Chicago Regional Council of Carpenters (“Union”) based out of the Union office in Rock Falls, IL, and was appointed as a trustee of the Fund by the Union.

307. Defendant, David Foy, is an Business Agent of the Union, and an officer of Millwrights Local 2158, and is responsible for enforcing Union CBAs for Millwrights within the Northern District of Illinois, Western Division, and was appointed as a trustee of the Fund by the Union.

308. Defendant, David Argubright, is a Business Agent of the Union and an officer of Carpenters Local 195 based in Ottawa, IL, and was appointed as a trustee of the Fund by the Union.

309. Defendant, Steven P. Tondi, is the President and CEO of the Association General Contractors of the Quad Cities based on Rock Island, IL, and was appointed as a trustee of the Fund by the Quad-City Builders Association pursuant to the Fund’s Trust Agreement.

310. Defendant, Greg Mulherin was appointed as a trustee of the Fund by the Illowa Millwright Contractors Association pursuant to the Fund’s Trust Agreement.

311. Defendant, Daniel F. Aussem, is the Executive Director of the Illinois Valley Contractors Association, and was appointed as a trustee of the Fund by the Illinois Valley Contractors Association pursuant to the Fund's Trust Agreement.

**Background Facts**

312. The Fund receives contributions from employers and employees by way of CBAs negotiated by the Union with individual employers and Employer Associations.

313. The Employer Associations consist of the Illinois Valley Contractors Association, Illowa Millwright Contractors Association and the Quad-City Builders Association (herein after collectively referred to as "Employer Associations").

314. Members of the Employer Associations assign their rights to the Employer Associations to represent their interests in collective bargaining with the Union, and are primarily engaged in commercial construction at multiple jobsites throughout the jurisdiction of the Union.

315. The Union is divided into three regions: Central; Western; and Southern. Each of the regions have distinct locals whose jurisdiction are confined therein.

316. The Western Region of the Union encompasses Carpenters Locals 4, 166, 195, 790, 792 and 2158 (hereinafter collective referred to as "Western Region Locals"), which is essentially the northwestern portion of the State of Illinois and three counties in Iowa which border the Quad-Cities (Scott, Muscatine, and Lousia). Carpenters Local 2158 is considered the Millwrights' local for the entire Western Region.

317. The Locals in the Western Region make up the portion of the Union which comprises the former Heartland Regional Council of Carpenters, and comprises the geographic area of the Fund.

318. Members of the Union and the Locals in the Western Region can work for any employer that has a CBA with the Union, and once the member establishes initial eligibility with the Fund is entitled to participate in the Fund and receive benefits provided that the contributing employer is covered by a CBA that allows for contributions to the Fund.

319. The Board of Trustees of the Fund consist of six members divided equally between the Union and the Employer Associations.

320. CBAs that are negotiated by Employer Associations with the Union provide for contributions to be paid by the employer on a monthly basis for each hour worked by a covered employee.

321. At all times relevant to this complaint, the Fund provides employees working for various employers under CBAs negotiated by Employer Associations with eligibility for health insurance benefits based on \$1,150.00 in “Required Contributions” being paid to the Fund the previous month worked. All amounts paid in excess of the \$1,150 in any given month are “banked” and applied towards future eligibility should any subsequent month’s contributions fall short of the \$1,150.00. The minimum contribution rate to achieve eligibly is commonly referred to as the “Composite Rate.”

322. The \$1,150.00 Required Contributions rate, or Composite Rate, has been set by the Trustees as part of their administration of the Fund and is a discretionary act.

323. The Fund’s Plan Document defines eligibility as follows:

**Initial Eligibility**

You initially become eligible on the first day of a calendar month immediately following the month in which Posted Contributions in your Dollar Bank equal or exceed the Required Contribution amount. Posted Contributions are the Employer contributions made to the Fund on your behalf to your Dollar Bank that are posted on the last day of the month following the work month they were accrued. The amount required to receive a month of eligibility under the Regular Plan or Reduced Plan, called the Required Contribution

amount, will be subtracted from the Dollar Bank on the first day of any month for which eligibility is granted. Any amount in a Dollar Bank that is attributable to Posted Contributions more than six months old for an Employee who is not yet eligible will be forfeited.

### **Continued Eligibility**

Eligibility will continue for each month as long as you have at least the Required Contribution amount in your Dollar Bank on the last day of the proceeding month.

324. In the event that the Dollar Bank is short on the last day of the preceding month, the Plan allows for self-contributions of funds to create eligibility.

325. Eligibility will terminate if the Required Contribution amount is not present in the Dollar Bank at the end of the contribution month.

326. Prior to July 1, 2017, the Required Contribution amount charged for all participants that had hourly contributions paid on their behalf was as follows:

<u>Plan Year</u>	<u>Required Contribution</u>
2010	\$950
2011	\$975
2012	\$1,000
2013	\$1,050
2014	\$1,050
2015	\$1,075
2016	\$1,150

327. In January of 2017, the Trustees decided to change the Required Contribution for certain categories of participants based on the location of their employment effective July 1, 2017. Specifically, the Trustees carved out participants based on the location of their employment and



created two Required Contribution amounts (composite rates); a “Shop” Required Contribution and a “Non-Shop” Required Contribution.

328. The Trustee claim that under the terms of the Plan and their rules and procedures, the Trustees are required to set the Required Contribution rates annually.

329. The Trustees created a Shop Required Contribution for participants that worked for the following employers: Raynor Garage Door, Carroll County, Onsite Woodwork Corporation, R & D Thiel, Inc., and City of Fulton Public Works (hereinafter collectively referred to as “Shop Employers”), and created a new Required Contribution amount for these participants of \$1,666.00.

330. The Trustees created a separate Non-Shop Required Contribution amount for all other participants working for employers covered by CBAs negotiated by employer associations, which was identical to the previous uniform Required Contribution amount of \$1,150.00.

331. The stated basis for this change in Required Contributions based on the location of the participant’s employment was that the contributions paid by Shop Employers did not cover the benefits paid out to their employees and dependents, while the contributions paid by Non-Shop Employers (covered by the Employer Association CBAs) covered benefits paid out to their employees and dependents.

332. In June of 2017, after receiving complaints, requests for information and requests for authority for the creation of two Required Contribution amounts, the Fund and Trustees created a new Shop Required Contribution amount of \$1,350 claiming that it had conducted a further study.

333. In July of 2017, the Fund and Trustees again changed the Required Contribution amount and created three separate Required Contribution amounts: Raynor Garage Door

employees \$1,485; “Small Shop Employers” (Shop Employers other than Raynor Garage Door) \$1,265; and Employer Association employers \$1,150.

334. The changes made to the Required Contribution amounts took effect August 1, 2017 and would be applied to eligibility September 1, 2017 and after.

335. Despite having set four Required Contribution amounts for Raynor employees in 2017 based on their “annual review”, the Trustees have threatened to set a higher Required Contribution amount without notice (not annually) to the participants, Raynor Garage Door or the Union.

336. The Trust Agreement allows for the Trustees to adopt a “Plan of Benefits” which sets forth “eligibility requirements, type and duration of benefits that are to be provided equally and without discrimination to eligible employees and beneficiaries...”

337. The Trust Agreement provides that contribution rates are set pursuant to the rates negotiated by the Union, and that the Trust Agreement cannot be amended in any which would conflict with any collective bargaining agreement that set contributions to the Fund.

338. On March 4, 2017, the Union entered into a CBA with Raynor Garage Door (“Employer”) which set the following contribution rates to be paid by the Employer and the Employees covered by the CBA to the Fund:

- Effective July 1, 2017, \$7.80 per hour (Employer Only);
- Effective July 1, 2018, \$8.40 per hour (Employer \$8.10, Employee \$0.30); and
- Effective July 1, 2019, \$8.82 per hour (Employer \$8.52, Employee \$0.30).

339. The CBA provides that Employees would be charged a Required Contribution amount or composite rate of \$1,150 a month for benefits consistent with the established composite rate that the Fund charges all employees that participate in the Fund.

340. The CBA further provides that the monthly rate of \$1,150 can be adjusted by the Trustees of the Fund on an annual basis, provided that all employees covered by the Fund are charged the same amount.

341. The Trust Agreement provides that “All Contributions shall become effective pursuant to the terms of the Collective Bargaining Agreement(s).”

### **FEDERAL RULE 23 ALLEGATIONS**

342. Plaintiffs bring this Claim for Relief on behalf of themselves and a class of all those similarly situated, defined as follows:

“All individuals who are either participants or beneficiaries of the Heartland Healthcare Fund as the result of a collective bargaining agreement negotiated with the Chicago Regional Council of Carpenters and Raynor Garage Door, and were required by the Heartland Healthcare Fund to have amounts in excess of \$1,150 paid into their benefit accounts in order to obtain eligibility for healthcare benefits.”

343. Upon information and belief, there are at least 300 persons in the Class, such that joinder of all members is impracticable.

344. The named Plaintiffs will fairly and adequately represent and protect the interests of the Class of members. Plaintiffs have retained counsel with substantial experience in prosecuting complex ERISA litigation. Plaintiffs and their counsel are committed to vigorously prosecuting this action on behalf of the members of the Class, and have the financial resources to do so. Neither Plaintiffs nor their counsel have any interest adverse to those of the other members of the Class.

345. Absent a class action, most members of the Class would find the cost of litigating their claims to be prohibitive, and will have no effective remedy. The class treatment of common

questions of law and fact is also superior to individual actions or piecemeal litigation in that it conserves the resources of the courts and the litigants, and promotes consistency and efficiency of adjudication.

346. The factual and legal bases of Defendants' liability to Plaintiffs and to the other members of the Class are the same, resulting in injury to the named Plaintiffs and to all of the other members of the Class as a result of Defendants' breach of their fiduciary duty as defined under ERISA and for openly violating the terms of the Trust Agreement through arbitrary actions. Plaintiffs and the other Class members have all suffered harm and damages as a result of Defendants actions.

347. The questions of law and fact relevant to this action are common to the claims of the named Plaintiffs and the other members of the Class, and those questions predominate over any questions that may affect individual members of the Class. Common questions for the Class include but are not limited to the following:

(a) Did Defendants violate the terms of the Trust Agreement by charging employees of Raynor Garage Door a higher Required Contribution amount to obtain benefits than employees of employers covered by the Employer Association;

(b) Did Defendant Trustee breach their fiduciary duties by charging employees of Raynor Garage Door a higher Required Contribution amount contrary to the Trust Agreement and or CBA in order to benefit Employer Association members and their employees to the detriment of Raynor Garage Door employees;

(c) Should Raynor Garage Door employees be charged the same Required Contribution amount as other employees under Employer Association CBAs; and

(d) Did the Fund misappropriate additional contribution amounts paid by Raynor Garage Door employees for the benefit of the Employer Association and covered employees.

**Count I Breach of Fiduciary Duty (All Defendants)**

348. Plaintiffs reallege and incorporate the allegations in paragraphs 1-347 as if fully alleged herein.

349. The diversion of contributions from Plaintiffs, and the decrease of benefits and coverage for Plaintiffs to pay the benefits of employees of Employer Association member employees in lieu of increasing the amount of contributions payable for all employees covered by the Fund was a breach of fiduciary duty under the exclusive purpose of ERISA § 404(a)(1)(A).

350. Defendants knowingly participated in the fiduciary violation by their use and diversion of the contribution from Raynor Garage Door employees to the Fund, when they knew or should have known that the contribution amounts charged to Raynor Garage Door employees was wrongfully diverted to pay benefits to employees of Employer Association members and their beneficiaries.

351. By creating higher contribution rates for Raynor Garage Door employees, the Defendants knowingly have diverted contributions meant to benefit Raynor Garage Door employees in order to subsidize lower contribution rates for employees of Employer Association members and their beneficiaries.

352. These acts by Defendants were done without amending the Trust Agreement and were done without any recognized authority pursuant to any governing document of the Plan.

353. As a result of Defendants' action, Plaintiffs and their beneficiaries have lost eligibility for benefits based on employer contributions, and are required to self-pay to make the new Required Contribution amount.

354. Pursuant to ERISA § 409(a) defendants are personally liable to Plaintiffs for the losses sustained as a result of the conduct hereinabove alleged.

**Count II Breach of Fiduciary Duty (All Defendants)**

355. Plaintiffs reallege and incorporate the allegations in paragraphs 1-347 as if fully alleged herein.

356. Defendants violated their fiduciary duty to Plaintiffs with respect to their eligibility to participate in the Fund under ERISA § 404(a)(1)(B), by failing to exercise their fiduciary duties with care, skill, prudence and diligence under the circumstances then prevailing that a prudent person would use by:

(a) Allowing for Plaintiffs to be treated differently than other employees covered by the Fund in terms of contribution rates and benefits;

(b) Diverting money from Plaintiffs to other employees to keep the Required Contribution amounts lower for employees of members of the Employer Associations;

(c) By failing to set Required Contribution amounts for all participants at a level sufficient rate to pay benefits and administrative expenses of the Fund; and

(d) By failing to enforce the Trust Agreement with respect to contribution rates set out in CBAs as well as the terms requiring the Fund and Trustees to treat all employees equally.

357. As a result of Defendants' action, Plaintiffs and their beneficiaries have lost eligibility for benefits based on employer contributions, and are required to self-pay to make the new Required Contribution amount.

358. Pursuant to ERISA § 409(a) defendants are personally liable to Plaintiffs for the losses sustained as a result of the conduct hereinabove alleged.

**Count III Unjust Enrichment (Employer Association Defendants)**

359. Plaintiffs reallege and incorporate the allegations in paragraphs 1-347 as if fully alleged herein.

360. Defendants, STEVEN TONDI, GREG MULHERIN, and DANIEL F. AUSSEM, have been unjustly enriched to the extent of the monies diverted from contributions paid by Plaintiffs have been used to subsidize employees of the Employer Association members and pay their benefits.

WHEREFORE, Plaintiffs request that a final judgment be entered herein as follows:

1. Holding Defendants liable for damages sustained by reason of Defendants' breach of fiduciary duty;
2. Compelling Defendants to make restitution to the Plaintiffs and/or the Fund for any amounts diverted to employees of the Employer Association members;
3. Compelling Defendants to redress their breaches of fiduciary duty by setting the same Required Contribution amount for all employees covered by the Fund; and
4. Awarding Plaintiffs prejudgment interest, reasonable attorney fees pursuant to ERISA § 502 (g), the costs of this action and such other relief that this Court may deem just and proper.

DATED: February 23, 2018

SANTOS A. RANGEL, et al.

s/ Raymond J. Sanguinetti  
Raymond J. Sanguinetti  
Rathje & Woodward, LLC  
300 East Roosevelt Road, Suite 300  
Wheaton, IL 60187  
(630) 668-8500